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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

IN RE COLLEGE ATHLETE NIL
LITIGATION

Case No. 4:20-cv-03919-CW

**DECLARATION OF RYAN SQUIRE IN
SUPPORT OF JOINT ADMINISTRATIVE
OMNIBUS MOTION TO SEAL**

1 I, Ryan Squire, declare as follows:

2 I am the Executive Senior Associate Athletic Director/Chief Integrity Officer at the
3 University of Illinois Urbana-Champaign (“the University of Illinois”). The University of Illinois
4 is a member of The Big Ten Conference, which is a defendant in this action. I make this
5 Declaration based on my personal knowledge and investigation, and if called as a witness to testify,
6 I could and would testify competently to the following facts.

7 1. This Declaration is being made in support of the Joint Administration Omnibus
8 Motion to Seal (“Motion”), and pursuant to Civil Local Rules 7-11 and 79-5.

9 2. The University of Illinois moves to maintain the confidentiality of certain portions
10 of the Expert Report of Catherine Tucker (Doc. 251-1) filed under seal by the Parties that reflect
11 the University of Illinois’ highly sensitive, non-public, current financial information.

12 3. Specifically, the University of Illinois requests that certain portions of the Report,
13 as described below and as identified in the Proposed Order Regarding Joint Administrative
14 Omnibus Motion to Seal (“Proposed Order”) as entry numbers 371, 373, and 378, be maintained
15 under seal.

16 4. A party seeking to file a document under seal must “establish that a document, or
17 portions thereof, are sealable.” Civil L.R. 79-5(b). In connection with a dispositive motion, a
18 designating party must demonstrate that “compelling reasons” exist to protect the information from
19 being disclosed. *Kamakana v. City & County of Honolulu*, 447 F. 3d 1172, 1178-79 (9th Cir.
20 2006). Redactions, instead of complete removal, can be used to place “limited and clear” portions
21 of information outside the public record. *Id.* at 1183.

22 5. The University of Illinois can demonstrate that compelling reasons exist to maintain
23 the following narrowly tailored redactions under seal.

24 **CONFIDENTIAL INSTITUTIONAL FINANCIAL INFORMATION**

25 6. The Report contains information which reflects the details of financial aid provided
26 by the University of Illinois to its student athletes as well as the specific manner in which the
27 University of Illinois awards such aid. The University of Illinois would be harmed by the
28 disclosure of such financial aid distributions, as it would reveal non-public information regarding

the University of Illinois' financial decisions to other NCAA members and other competitors. *See Nixon v. Warner Commc'ns, Inc.*, 435 U.S. 589, 598 (1978).

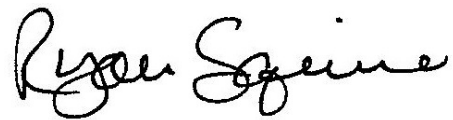
7. Therefore, the University of Illinois supports the Parties' Motion to redact those portions of the Report which contain the University of Illinois' confidential financial information, as identified below and in the Proposed Order:

Document	Entry Number	Text to be Sealed
Expert Report of Catherine Tucker [ECF No. 251-1]	371	p. 115, Figure 7
Expert Report of Catherine Tucker [ECF No. 251-1]	373	p. 116, Figure 8
Expert Report of Catherine Tucker [ECF No. 251-1]	378	p. 118 Figure 9

8. For the foregoing reasons, the University of Illinois respectfully submits that compelling reasons exist to seal the information as identified above and in the Proposed Order.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on September 28, 2023, in Champaign, Illinois.



Ryan Squire